

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No.: 19-21434-glt  
Martin L. Veitz and :  
Bonnie S. Veitz, Debtors : Chapter 13  
: Related to Doc. #82

:

**RESPONSE TO RULE TO SHOW CAUSE**

AND NOW COME the Debtors, Martin L. Veitz and Bonnie S. Veitz, by their counsel, Shawn N. Wright, Esquire, to state the following in response to the Rule to Show Cause issued by this Honorable Court:

1. A response to the Notice of Mortgage Payment Change filed by Movant was not timely filed in this matter.
2. As a result, this Honorable Court issued a Rule to Show Cause at Document Number 82.
3. Undersigned Counsel has entered his appearance on behalf of the Debtor on December 13, 2021, and has also filed a Declaration to the Notice of Mortgage Payment Change.
4. Attorney Mark Moynihan is in the process of withdrawing from his Chapter 13 cases and is in the processing of retiring from the practice of law.
5. Undersigned Counsel will be representing the Debtors in this case in the future.

WHEREFORE, the Debtors so respond to the Rule to Show Cause.

Attorney for Debtors

/s/Shawn N. Wright  
Shawn N. Wright, Esquire  
7240 McKnight Road

Pittsburgh, PA 15237

(412) 920-6565

Pa. I.D. No. 64103

[shawn@shawnwrightlaw.com](mailto:shawn@shawnwrightlaw.com)